

I believe the proposal presented in RM-10809 is harmful to the interests of the Amateur Radio Service and for the effective and efficient use of limited available HF spectrum. Therefore, I strongly oppose it. Essentially it is a "half-way" compromise that

meets no one's needs. It allows full access to CW band segments (as well as voice and digital segments) to unqualified operators, thus reducing the efficiency with which this limited spectrum is used.

Assigning a 5wpm CW qualification to Extra class operators is pointless as such a skill level hardly qualifies one for "expert" designation and the privileges and responsibilities that might be linked to it. An approach of segregating learners or novices until

they achieved sufficient skill would be reasonable and preferable as would a more realistic 15-to-20 wpm speed qualification for Extra class privileges in the CW segments.

Sincerely,

James Knight, W2JLK